



ENERGY TRANSFER

Contractor Safety Manual

Introduction

Energy Transfer Partners (Company) strives, at all times, to maintain a safe and healthy workplace for our employees, Contractors, and the communities in which we operate. The Company relies on all parties to maintain a healthy and safe work environment.

This document was developed to convey, to applicable third party Contractors (i.e. Contractors, Subcontractors, Inspectors, ROW agents, contract employees, etc.) and all other interested parties the basic Company health and safety (HS) processes that apply to work conducted on Company property or while representing the Company. This manual is not intended to replace or circumvent any applicable health and safety standards as stipulated by federal, state, or local regulations or Contractor requirements that are found to be equal to or exceeding the requirements of this document.

In accordance with the applicable agreement under which Contractor is providing work or services to Company, all Contractors performing work on behalf of the Company are considered 'Independent Contractors' in all matters related to the safety and health of their employees. Company personnel shall not stipulate and/or direct Independent Contractor/Subcontractor personnel to operate and/or work in a manner that is contrary to established safety rules and regulations. The requirements of this Contractor Safety Manual shall be incorporated in its entirety as integral terms and requirements under the applicable service or construction agreement between Company and Contractor. In all cases where Contractor and Company requirements conflict the Company requirements shall take precedence.

The Company would like to thank you, in advance for making a commitment in insuring the safety and health of your employees, our personnel, and our communities.

Safety Expectations

Energy Transfer Partners (Company) expects that each Contractor and the employees of said companies will perform their individual duties in a manner that is not injurious or otherwise dangerous to themselves or others. Each Contractor and by default, Contractor personnel, Subcontractors and their personnel are solely responsible for their own safety. It is each person's responsibility to report at-risk behaviors and/or conditions as they are

Energy Transfer Contractor Safety Manual

encountered and to effect immediate remediation of the problem in order to prevent adverse impact to property and personnel.

All Contractors are contractually obligated to comply with all applicable federal, state, local and Company safety and health rules and regulations including applicable Company site-specific and/or business unit policies and procedures. Therefore, it shall be the responsibility of each Contractor and/or Subcontractor, to assess the hazards associated with their activities, and to develop site-specific safety strategies and procedures to mitigate or eliminate identified risks. All site-specific safety plans shall detail how health and safety aspects of the project will be managed and the systems that will be employed to maintain compliance with Company, federal, state, and local requirements. Procedures and processes developed to satisfy the requirements of this plan must work in concert with the existing safety management processes at each affected facility. In addition to the site-specific plans, all Contractors shall have and adhere to their own core health and safety plans, which must contain rules and procedures that apply to and mitigate the perceived hazards associated with the Contractors specialty. In the event that these or any other applicable Company safety and health requirements conflict with federal, state, local regulatory requirements and/or the Contractors/Subcontractors own safety requirements, the procedures/rules/regulations which are most protective of human life and Company property shall prevail.

English is the official language for all modes of communication at all Energy Transfer worksites. If Contractors and/or Subcontractors employ individuals that cannot or have a limited ability to read, write and/or comprehend the English language, said entity shall ensure that all safety and health related data is presented to each affected individual in their native language. This requirement applies, but is not limited to the Contractors/Subcontractors basic and site specific safety plans, orientation documents, safety forms, work permits, and Material Safety Data Sheets.

The contents of this document cannot replace the application of good judgment and common sense in preventing adverse health effects and safety related incidents. Therefore, it shall be the responsibility of each individual to work safely and insist that others do the same. Each person must consider the significances of their actions and diminish any adverse consequences. No one, contract or otherwise, shall knowingly work and/or remain in areas where unsafe conditions exist, persist or have the potential to develop without mitigation methods being properly implemented and maintained. Under no circumstances will the Company require anyone or have an expectation that anyone will be required to expose themselves or others to hazardous or otherwise unsafe conditions.

It will be each Contractors obligation to disseminate the information contained in this manual to all applicable personnel, including subcontract personnel, prior to accessing Company property or projects.

Energy Transfer Contractor Safety Manual

NOTE: the Company requires each person to refuse to work in or otherwise occupy areas where hazards exist or have the potential to develop, without first receiving the appropriate training and implementing and maintaining proper mitigation methods.

The Company provides periodic updates to this manual. A copy of the most current version can be found on the Company website at <http://www.energytransfer.com/docs/contractorssafetymanual.pdf>

Energy Transfer Contractor Safety Manual

Contents

A. ROLES AND RESPONSIBILITIES	6
A.1 CHIEF INSPECTORS.....	6
A.2 CRAFT INSPECTORS	6
A.3 CONTRACTOR AND SUBCONTRACTOR SUPERINTENDENTS or designees as deemed appropriate.....	6
B. EMPLOYEE INVOLVEMENT AND DISSEMINATION OF SAFETY INFORMATION	9
B.1 INVOLVEMENT	9
B.2 COMMUNICATION	9
B.3 SAFETY “TOOLBOX / TAILGATE” MEETINGS	9
B.4 OBJECTIVES, PLANS, AND PERFORMANCE STANDARDS	9
B.5 MANAGEMENT SYSTEM DOCUMENTATION.....	10
C. IMPLEMENTATION.....	10
C.2 SAFETY PROCEDURES.....	10
C.3 FIRE PROTECTION AND PREVENTION.....	10
C.4 HAZARD IDENTIFICATION & MITIGATION	10
C.5 HAZARD COMMUNICATION	11
C.6 MARKING PHYSICAL HAZARDS	11
C.7 MAINTENANCE AND REPAIR OF TOOLS & EQUIPMENT.....	12
C.8 EMPLOYEE SELECTION, COMPETENCY, AND TRAINING	12
C.9 PERSONAL PROTECTIVE EQUIPMENT (PPE).....	13
C.10 SECURITY.....	13
C.11 SAFETY TRAINING	13
C.12 EMERGENCY RESPONSE PLAN (ERP)	16
C.13 FIRST AID, MEDICAL CARE SERVICES, AND FACILITIES	17
D. WORKPLACE ENVIRONMENT	18
D.1 CHAINS, SLINGS, AND CABLES.....	18
D.2 CRANES, RIGGING AND CRIBBING	18
D.3 CONFINED AND/OR ENCLOSED SPACES	18
D.4 ELECTRICAL SAFETY	19
D.5 EXCAVATIONS / TRENCHING / SHORING.....	21
D.6 FALL PROTECTION.....	21
D.7 FIRE WATCH	22

Energy Transfer Contractor Safety Manual

D.8 PROTECTION FROM FALLING OBJECTS	22
D.9 HAZARDOUS ENERGY ISOLATION (LOCK OUT / TAG OUT OR LOTO)	23
D.10 HOUSEKEEPING.....	23
D.11 LADDERS & STAIRWELLS	24
D.12 MATERIALS HANDLING, STORAGE, USE, AND DISPOSAL	24
D.13 SCAFFOLDING.....	25
D.14 ILLUMINATION	25
D.15 NON-POTABLE WATER	26
D.16 POTABLE WATER	26
D.17 MEANS OF EGRESS	26
D.18 PERSONAL HYGIENE	26
D.19 PROCESS SAFETY MANAGEMENT.....	27
E. OCCUPATIONAL HEALTH AND ENVIRONMENTAL CONTROLS	27
E.1 HAZARDOUS ATMOSPHERES.....	27
E.2 NOISE EXPOSURE	27
E.3 IONIZING RADIATION	28
E.4 GASES, VAPORS, FUMES, DUSTS, AND MISTS.....	28
E.5 ASBESTOS.....	29
E.6 LEAD.....	29
E.7 RESPIRATORY PROTECTION	29
E.8 WORK PERMITS	30
F. MONITORING AND EVALUATION	31
F.1 INSPECTION, TESTING AND MONITORING	31
F.2 HEALTH MONITORING SYSTEMS.....	31
F.3 WORKERS COMPENSATION	31
F.4 REGULATORY AGENCY INSPECTIONS	31
F.5 INCIDENT REPORTING AND INVESTIGATION	32
F.6 HEALTH AND SAFETY INFORMATION AND REPORTS.....	32
F.7 GENERAL COMPANY CONTACT INFORMATION	33

Energy Transfer Contractor Safety Manual

A. ROLES AND RESPONSIBILITIES

The following Roles and Responsibilities provide general guidance and may not apply to all situations in which this manual applies. The abbreviated explanation of obligations that follows each job title provides a basic description of the safety obligations for a typical construction and/or maintenance project. Not all items and/or job titles may apply to any single job scope. Conversely, not all potentially applicable safety and/or health roles and responsibilities are listed herein. Each project's individual safety and health requirements will ultimately dictate a complete and objective scope of health and safety essentials.

A.1 CHIEF INSPECTORS

- Stop and correct any activities perceived to be Immediately Dangerous to Life & Health (IDLH).
- Create a reporting structure for Craft Inspectors that facilitates documentation and communication of safety related reviews and observations.
- Encourage Near Miss reporting.
- Perform or contribute to site safety reviews.
- Ensure that safety related observations and infractions are disseminated to the appropriate Company and Contractor representatives as soon as practical after observance.
- Work with Company personnel to manage site safety requirements and hazard mitigation efforts.

A.2 CRAFT INSPECTORS

- Stop any activities perceived to be IDLH.
- Observe, and report to the Chief Inspector, all perceived infractions of established safety and health rules and regulations.
- Provide safety compliance assistance as deemed appropriate by the Chief Inspector.

A.3 CONTRACTOR AND SUBCONTRACTOR SUPERINTENDENTS or designees as deemed appropriate

Contractor and Subcontractor Superintendent's shall comply with Company and Contractor requirements, including but not limited to verifying the implementation of the Contractor's internal safety management programs and processes in addition to:

- Stop and correct any activities perceived to be IDLH.
- Implement Contractor's core (general) construction safety requirements.

Energy Transfer Contractor Safety Manual

- Establish, document and maintain a site-specific safety management plan(s) that include safe work procedures predicated on the requirements of the work, this manual, and the Contractors' own safety requirements.

Note: site-specific plans must be inclusive of all job tasks and activities performed by Contractor personnel.

- Document, maintain, and update contact information for principle project personnel to include name, title, company affiliation, and phone numbers where each individual can be contacted at any time. This information must be readily available, at the job site, for Contractor, Subcontractor and/or Company review.
- Identify compliance requirements of relevant legislation, standards, and codes of practice for the designated scope of work.
- Identify risks based on the scope of work using standard risk assessment methodologies.
- Conduct and document safety related reviews of work locations as required to verify compliance with established safety rules and procedures.
- Enable site safety resources to achieve compliance with the requirements of this plan, the Contractor's own general and site-specific plans and all other applicable safety rules, laws and regulations by allocating the necessary resources and providing visible management support.
- Actively participate in safety meetings.
- Establish a process for reviewing and acting upon risk observations, risk mitigation efforts, audits, and inspection findings.
- Conduct applicable Contractor/Subcontractor/Visitor orientations and provide the appropriate personnel protective equipment to affected visitors/employees prior to arriving at work location.
- Verify personnel training is being performed in compliance with applicable laws, rules and regulations.
- Verify Contractor and Subcontractor personnel have the appropriate level of training and/or supervision to successfully complete assigned tasks.
- Verify the qualifications and competence of equipment and machine operators.
- Keep and maintain records and logs of training, orientations, and incident reporting.
- Require the use of Job-Safety-Analysis/Job-Hazard-Analysis or similar processes for identification and management of risk associated with the designated work.
- Verify, through a documented process, that Job Safety Analysis / Job Hazard Analysis (JSA/JHA) or similar processes are being utilized to analyze and mitigate risks associated with work that is not considered routine, has never been performed or that has not previously been subjected to scrutiny using JSA/JHA type evaluation.
- Require that all relevant personnel have reviewed the results of all applicable safety analysis reports and understand them completely prior to commencing work activities. Once reviewed and comprehension

Energy Transfer Contractor Safety Manual

verified, the appropriate supervisor/lead man shall confirm that the affected personnel sign and date a copy of the applicable hazardous analysis form.

- Verify and document that the appropriate safety analysis documents are reviewed with new personnel and with individuals that are new to a given work process prior to beginning their assigned duties.
- Verify that safety analysis results are reviewed for applicability, as needed, or when changes in job conditions warrant and/or cause an increase in risk to personnel and/or the environment.
- Require and document daily safety toolbox meetings or similar safety meetings where daily activities are discussed among affected personnel prior to commencement of work.
- Require that procedures for reporting incidents and at-risk behavior or conditions be followed.
- Verify compliance with Company procedures for investigating incidents.
- Confirm Contractor/Subcontractor personnel follow applicable procedures for maintaining the integrity and security of Energy Transfer facilities
- Help to maintain a safe and secure work environment by reporting and correcting at risk behaviors and conditions in a timely fashion.
- Develop emergency response procedures that take into account identified hazards of specific work locations. These procedures must include information pertaining to emergency response entities, the corresponding facilities, and emergency response phone numbers.
- If in a public location, verify a procedure has been developed and implemented to alert the public and other personnel in the general vicinity of the work location, of an emergency.
- Respond to emergency events and verify that injured personnel are cared for promptly and that the area is sufficiently secured against alteration pending an investigation.
- Gather and submit required safety related information (i.e. Near Miss, Lost Time Incidents, Reduced Work Events, Recordable Incidents, Leading & Lagging Indicators, etc.).
- Make first aid kits available and maintain as required by this manual and OSHA regulations.
- Provide feedback on current safety related events and incidents as well as topics for daily safety 'toolbox' / 'tailgate' meetings.
- Manage all safety related Contractor and Subcontractor documentation.
- Verify and document that sub-contractor's safety policies and procedures meet or exceed the expectations of both the Company and the Contractor's own Safety and Health Program.
- Require Sub-Contractors to submit correct and pertinent information (i.e. Near Miss, Lost Time Incidents, Reduced Work Events, Recordable Incidents, Leading & Lagging Indicators, etc.) at the same intervals as the General Contractors and that the information is reported to the Company as required.

Energy Transfer Contractor Safety Manual

B. EMPLOYEE INVOLVEMENT AND DISSEMINATION OF SAFETY INFORMATION

B.1 INVOLVEMENT

Employee involvement is essential to the reduction of incidents and accidents and the promotion of an effective safety culture. To enhance employee safety on construction sites, personnel must be able to anticipate and recognize hazards associated with the designated work. Safety toolbox or tailgate meetings as well as participation in the JSA process provide the interaction opportunity necessary to heighten employee awareness and provide a platform for personnel to ask questions and clarify statements.

ETC strongly encourages employee involvement as it provides the environment through which employees can develop and express their own commitment to safety. Methods to promote employee involvement include, but are not limited to,

- Attend pre-job kick off meeting
- Attending morning or pre-shift safety “toolbox” or “tailgate” meetings
- Attending orientation and scheduled safety meetings
- Participation in the development and implementation of JSA/JHA type activities
- Regular safety training

B.2 COMMUNICATION

Communication between the Company, inspection team, and the Company representatives is a critical element in managing safety. Scheduling regular meetings to communicate safety issues is imperative to success.

B.3 SAFETY “TOOLBOX / TAILGATE” MEETINGS

Safety toolbox / tailgate meetings or similar type meetings must be held at the beginning of each workday, to raise the awareness level of affected personnel.

B.4 OBJECTIVES, PLANS, AND PERFORMANCE STANDARDS

Contractors and their Subcontractors are solely responsible for compliance and enforcement of safety related matters associated with their respective scopes of work. All supervisory personnel shall communicate the project health and safety objectives, plans, and performance standards during the orientation process, and during the development of JSAs and at toolbox meetings to insure an understanding of and participation in achieving the project's health and safety goals.

Energy Transfer Contractor Safety Manual

B.5 MANAGEMENT SYSTEM DOCUMENTATION

All Contractors and Subcontractors shall maintain project specific safety documentation subject to ETC review and approval, including revisions to this document and associated site – specific safety plans in paper and electronic formats, as appropriate, in public access locations.

C. IMPLEMENTATION

C.1 AUDITS, OBSERVATIONS, AND REVIEWS

It is the Contractors and/or Subcontractors responsibility to initiate and maintain a program that provides for frequent and regular inspections, reviews, and audits of job sites, materials, tools, and equipment. All audits and/or reviews required under this plan shall be conducted by Competent Personnel designated by their respective employers.

C.2 SAFETY PROCEDURES

Contractors must develop, approve, and implement work plans, including safety procedures that effectively manage hazards and risks arising from the Contractors and/or Subcontractors activities. Safety procedures must be developed in a manner that:

- Provides the level of detail required to manage and mitigate specific hazards and risks
- Documents the processes and controls used to verify a safe system of work for key work activities.

C.3 FIRE PROTECTION AND PREVENTION

Contractors and their Subcontractors shall be responsible for the development and maintenance of an effective fire protection and prevention program throughout all phases of construction, repair, alteration, or demolition work. The program shall not conflict with existing facility programs.

C.4 HAZARD IDENTIFICATION & MITIGATION

Contractors/ Subcontractors shall use standard risk assessment methods to identify and communicate hazards. These methods should facilitate:

- Identification, likelihood, and consequences of occurrence of identified hazards.
- Implementation of necessary controls.
- Use of Job Safety Analysis (JSA) or similar tool for identification and communication of hazards.
- Development of effective hazard control systems prior to mobilization and construction.
- The preferred hierarchy for the control or management of risks shall be
 - Elimination – eliminate hazards through design/process modification.
 - Substitution – replace hazardous materials / processes with less hazardous option(s).

Energy Transfer Contractor Safety Manual

- Isolation – physically remove the person from the exposure hazard.
- Engineering – provide for a structural change to the work environment, process, or equipment.
- Administrative – control hazard exposure events through job rotation, warning signs, barriers, etc.
- Personal Protective Equipment – place a barrier between the wearer and the hazard.

C.4.1 Job Safety Analysis (JSA)

A useful tool for hazard identification and risk communication is the Job Safety Analysis (JSA) process. The JSA is a documented process that focuses on the relationship between the worker, the task, the tools, and the work environment and requires that supervisors actively involve all members of the work crew in its development. Once hazards have been identified, steps can be taken to eliminate or reduce the hazards to an acceptable level. All JSA's (or equivalent) shall be maintained at the project location for the duration of the work and made available for review by Contractors, subcontractors and Company personnel.

C.5 HAZARD COMMUNICATION

Each Contractor shall ensure that all chemicals and materials used on Company property, including those used by Subcontractors, have been evaluated and information concerning identified hazards has been disseminated to all affected personnel. The transmittal of information is to be accomplished by means of a comprehensive Hazard Communication Program. This program shall, at a minimum, include:

- A complete list of all hazardous and/or dangerous chemicals and materials present at the work location
- A system to label work place containers, including those that are empty
- Information on interpreting container labels, if required to discern uncommon markings.
- Preparation and distribution of safety data sheets (SDS).
- Implementation of an employee-training program that communicates to affected employees' information regarding the hazards of chemicals and materials in the workplace and protective measures to mitigate harmful effects.

C.6 MARKING PHYSICAL HAZARDS

C.6.1 COLOR CODING

Red – shall be used to identify Dangerous hazardous to include; A) fire protection equipment and apparatuses; B) cans or other portable containers of flammable liquids with a flashpoint below 80 degrees F.; C) red lights shall be used at solid barricades and temporary obstructions; D) all danger signs including barricade tape; E) stop signs at road crossings, stop bars and/or stop buttons on hazardous machines.

Energy Transfer Contractor Safety Manual

Yellow – shall be used to designate caution and for marking physical hazards such as striking against, stumbling, falling, tripping, caught-in-between, etc.

C.6.2 SIGNS, SIGNALS, AND BARRICADES

Signs, signals, and barricades used for marking hazards, shall be visible at all times during the execution of the designated work and shall be removed or covered promptly when the hazards no longer exist.

Danger signs - shall be used to indicate an immediate danger and that special precautions are necessary.

Caution signs – shall be used to warn against potential hazards or to caution against unsafe practices.

Safety Instruction signs – shall be used where there is a need for general instruction relative to safety measures.

C.6.3 VEHICULAR TRAFFIC AND PEDESTRIAN PATHWAYS

Signs, signals, barricades and personnel whose duties require them to design traffic and pedestrian flow control measures as well as individuals that control the actual flow of traffic and pedestrians, commonly known as “Flaggers”, shall meet the requirements of the most current revision of the Manual of Uniform Traffic Control Devices (MUTCD). Contractors will be required to inspect traffic and pedestrian control devices on a continual basis to ensure each is installed and maintained in accordance with the authorized traffic control plan.

C.7 MAINTENANCE AND REPAIR OF TOOLS & EQUIPMENT

Contractors and Subcontractors shall develop programs for routine inspection, documentation, and maintenance of construction tools and equipment. Frequency of inspection and maintenance schedules shall reflect the manufacturers and regulatory requirements as well as best management practices. At minimum, each piece of mobile construction equipment (e.g. cranes, forklifts, frontend loaders, man-lifts, etc.) must be visually inspected prior to use on each shift. The applicable daily inspection document must remain with each piece of equipment as evidence of completion and compliance. Equipment found to be defective or in a dangerous condition shall be immediately taken out of service, removed from the work area and tagged to prevent use. Tools and equipment shall not be operated without proper shielding/guarding devices in place.

C.8 EMPLOYEE SELECTION, COMPETENCY, AND TRAINING

Each employer shall be responsible for assessing and confirming that personnel are competent, capable and certified (when required) to perform their assigned duties. It is the responsibility of all Contractors and Subcontractors to hire only qualified and trained personnel. Contractors and subcontractors shall verify and

Energy Transfer Contractor Safety Manual

document the qualifications and certifications of their employees and if requested provide copies of resumes, Curriculum Vitas (CV), job history, or other forms of documentation to the Company for review.

C.9 PERSONAL PROTECTIVE EQUIPMENT (PPE)

All Contractors and Subcontractors are responsible for supplying and requiring the use of appropriate personal protective equipment and devices in all operations where there is an exposure to hazardous conditions or where the use of such equipment will reduce the risk of personal injury. PPE shall be maintained, on-site, in sufficient quantities to facilitate immediate outfitting of personnel on a daily basis. All PPE must meet the requirements of the appropriate American National Standard Institute (ANSI) program and be properly embossed.

Basic PPE requirements for all Energy Transfer sites includes hard hats, safety glasses, safety toed shoes, long pants and shirts with a minimum one-quarter sleeves. Both pants and shirts must be made of natural fibers (i.e. cotton). Shirrtails, long sleeves and other loose articles of clothing and jewelry shall be maintained in a way that does not allow entanglement in machinery/equipment that is rotating or otherwise in motion.

Fire Retardant clothing (FRC) may be required in certain locations while conducting certain hot work activities. Contractors and Subcontractors shall furnish FRC to their employees at no cost when required.

Specialized PPE may be required under certain circumstance as dictated by the hazards of the designated work (e.g. full-face shields, gloves, shin guards, snake chaps, metatarsal guards etc.). It shall be the sole responsibility of the Contractor/Subcontractor to evaluate the need for specialized PPE and to supply said equipment at no cost to affected employees.

C.10 SECURITY

Each person requesting entry to Company property must possess the appropriate credentials (e.g. personal identification, TWIC card). Contractor/Subcontractor personnel shall not roam around Company facilities or occupy and/or pass through areas outside of their designated areas. All vehicles and personal property brought on to Company sites are subject to security screening.

C.11 SAFETY TRAINING

All Contractor and subcontractor personnel, including visitors, accessing Company property shall receive the Company General Visitors & Contractor Safety Orientation and the applicable site-specific orientation before commencing work or accessing the project site(s).

Energy Transfer Contractor Safety Manual

In addition to the Company orientation process, Contractors, and their subcontractors must provide relevant safety training to each employee prior to initial exposure to worksite hazards. This training must include instruction concerning applicable rules and regulations as well as guidance in the recognition and avoidance of unsafe conditions that can lead to illness and/or injury and methods to control or eliminate recognized hazards. It is the Contractors' responsibility to ensure that subcontractors adhere to the requirements of this manual, the Contractors' own safety procedures and to certify their personnel as required. All applicable training records shall be made available for review upon request.

The following types of qualification, certifications, or licenses are required, as applicable:

Certification/ Qualification	Purpose	Record Type
Initial & Site Specific Safety Orientation	Provide initial and site specific safety information prior to accessing Company production facilities	Hard Hat Sticker / Wallet Card Personal Acknowledgement Form
Hearing Protection	Provide awareness of the dangers of noise exposure, hazard recognition tools, and mitigation methods.	Employer Certification 1910.95(k)
Cranes –Competent & Qualified Persons	Provide instruction on applicable OSHA requirements of Subpart CC	Employer Certification 1926.1430(d)
Crane Operator (crane lifting capacity >2,000 lbs.)	Ensure that all personnel operating cranes covered under 29 CFR Subpart CC are trained and certified to operate said equipment.	Certification by accredited testing organization 1926.1427(b) OR Certification by an Audited Employer Program 1926.1427(c) OR Licensing by a government entity 1926.1427(e)
Crane – Signal Person	To ensure persons directing the Crane Operators actions have the requisite knowledge to direct lifting and lowering operations.	29 CFR 1926.1428 Employer Certification (non-transferrable) OR Certification from Qualified 3 rd Party Evaluator (transferable)
Crane - Rigger Qualified Person	Provides rigging services when lifting loads	Employer Qualification/Certification 1926 Subpart CC
Respiratory Protection Program – Program Administrator	Provide personnel that are qualified by appropriate training or experience commensurate with the complexity of the program to administer and/or oversee it and to the conduct the required evaluations of program effectiveness.	Employer Designation/Certification 1910.134(c)(3)
Respiratory Protection	Provide comprehensive, understandable and effective training to employees who are required to use respirators	Employer Certification 1910.134(k)

Energy Transfer Contractor Safety Manual

Hazard Recognition	To instruct each employee in the recognition and avoidance of unsafe conditions and the regulations applicable to their work environment to control or eliminate any hazards or other exposure to illness or injury	Employer Certification 1926.21(b)(2)
Electrical Awareness / Ground Fault Protection	Help prevent exposure to live electrical systems and reduce the risk of electrical shock from contact with power transmitters (i.e., overhead, ground level and underground sources)	Employer Certification 1910.332
Hazard Communication	Provide information regarding the safe handling and use of poisons, caustics, and other harmful substances, and the potential hazards, personal hygiene, and personal protective measures required	Employer Certification 1910.1200(a)(1)
Storage/Handling of LPG	Provide instruction on the proper installation, removal, operation and maintenance of handling & storage facilities	1910.110(b)(16)
Process Safety Management of Highly Hazardous Chemicals	Provide the necessary training for each employee to safely and effectively complete their assigned tasks while working in a PSM regulated facility	1910.119(h)(3)(i) OR 1926.64(h)
Flammable Materials	Provide instruction to personnel required to handle or use flammable liquids, gases, or toxic materials and provide instruction of the safe handling and use of these materials and made aware of the specific requirements contained in OSHA CFR 1926 Subparts D, F and other applicable subparts	Employer Certification 1926.21(b)(5)
Means of Egress – Employee Emergency Action Plans	To designate and train employees to assist in a safe and orderly evacuation of other personnel and to ensure all personnel know their respective responsibilities in the event of any emergency	Employer Certification 1910.38(e); 1926.35(e)(1)
Ladders & Stairways	Enable personnel to recognize the hazards associated with using ladders and stairways and mitigation methods to avoid said hazards	Employer Certification 1926.1060
Ionizing Radiation	Ensure only properly trained and licensed professionals handle radioactive sources	Certification 1926.53(b)
Excavation General Protection Requirements	Provide the knowledge necessary to identify proper excavation protection methods and avoid hazards posed by improper applications of those controls	Employer Certification 1926.651
Excavation - Competent Person	Provide the design and creation of a compliant excavation. Conduct inspections of excavation each day at the beginning of each shift prior to entry.	Employer Certification 1926.651
Excavation – Awareness Level	Provide the necessary training to allow personnel entering an excavation to identify, assess, and mitigate potential hazards.	Employer Certification 1926.651
Lead (Awareness Level)	To prevent the inadvertent disturbance of or exposure to lead containing materials	Employer Certification 1910.1200
Underground Construction	Provide instruction in the recognition and avoidance of hazards associated with underground construction activities	Employer Certification 1926.800

Energy Transfer Contractor Safety Manual

Construction Equipment Operator	Operate equipment associated with construction activities	Employer Certification 1926.20(b)(4)
Welding & Cutting	Instruct personnel in the safe use of tools, materials and equipment during Arc/Gas welding & cutting operations	1910 Subpart Q OR 1926 Subpart J
Hand & Power Tools	Provide basic safety instruction for woodworking tools	Employer Certification 1926.300-302
Scaffolding	Provide for the proper erection, inspection and maintenance of scaffolding systems	Certification 1926.454
Fall Protection	Provide instruction to each employee that might be exposed to fall hazards enabling them to recognize the hazards of falling and methods to mitigate these hazards.	Written Employer Certification 1926.503(b)(1)
Material Handling Equipment	Provides trained and authorized personnel to operate the applicable equipment	Employer Certification
Site Clearing	Awareness training for protection against exposure or irritating or toxic vegetation and instructions on applicable first aid treatment	Employer Certification 1926.21(b)(4)
First Aid, CPR, AED	Emergency Medical Response	Certification 1926.50(c) 1910.151(b)
Blood Borne Pathogens	Instruction of the proper handling and disposal of bodily fluids in response to an incident	Employer Certification 1910.1030
Confined Space	Operations that include the entry of personnel into a space that has limited entry/egress, hazardous or potentially hazardous atmosphere or as otherwise specified in 29 CFR 1910 & 29 CFR 1926	Employer Certification 1910. OR 1926.21(b)(6)
Portable Fire Extinguishers	To familiarize personnel with the general principals of fire extinguisher use and the hazards involved with incipient stage fire fighting	Employer Certification 1910.157(g)(1)
Fire Prevention - General Industry	To inform employees of the fire hazards to which they are or maybe exposed to and to inform personnel of the requirements for self-preservation.	Employer Certification 1910.39(d)
Fire Protection & Prevention - Construction	As warranted, employer shall provide trained and equipped firefighting organization in order to assure adequate protection of life	Employer Certification 1926.150(a)(5)
Fire Watch	Provides visual confirmation of fire prevention measures during "hot" work activities and extinguishes small fires as they occur.	Employer Certification 1910.252(a)(2)(iii)
Signaling / Flagman	Provides traffic control and directional assistance during activities that interface with the general public	Employer Certification
Traffic Control Planner	Designs and maintains the necessary arrangements for proper and safe temporary traffic control	Employer Certification

C.12 EMERGENCY RESPONSE PLAN (ERP)

Emergency Response Plans shall be written in English and state the response requirements of Contractor and Subcontractor personnel. ERPs shall not conflict with existing ETC Emergency Response Plans.

Energy Transfer Contractor Safety Manual

If not included in the site Emergency Action Plan the Contractor/subcontractor's Emergency Response Plan shall, at a minimum address the following:

- Emergency reporting and notification requirements (e.g. fire / medical / compromised utilities)
- Identification of appropriate emergency response activities (e.g. fire response / civilian or employee injury)
- Identification of appropriate emergency response organizations that may be called to respond during an emergency
- Alarm and evacuation plans relevant to the project construction site
- Assignment of roles and responsibilities to key personnel
- Development of an emergency contact list and establishment of posting requirements
- Location of Muster / Assembly Points
- Interface protocol for construction and facilities personnel

C.13 FIRST AID, MEDICAL CARE SERVICES, AND FACILITIES

A risk assessment of possible emergencies with respect to the designated work and the proximity of emergency services location(s) shall be conducted by the Contractor and Subcontractor to verify supplied first aid equipment and medical response resources are appropriate to manage all potential injury events. The Contractor and / or subcontractor shall make first aid and medical care services available to every employee. They shall also identify and document the capabilities of the closest medical facilities (including trauma level response capabilities) that can provide prompt medical attention in case of serious injury prior to commencement of the project. Medical facilities will be appropriate to the type and location of the work being performed and be consistent with local regulatory requirements and the safety plan. Additionally, all emergency contact information, including the physical address of the facilities shall be posted in a conspicuous, central location prior to commencement of work activities and maintained throughout the project as required.

First aid supplies shall be made easily accessible to all employees and in sufficient quantity to manage potential injury events. Contractor and subcontractor management shall verify that each first aid kit is complete before placing them on a job site for use and make first aid equipment checks a part of the regular site safety inspection program.

In the absence of a medical facility or physician, which is reasonably accessible in terms of time and distance to the worksite and is available for the treatment of injured employees, a person who has a valid certificate in first-aid shall be available at the worksite to render immediate first aid response. A list of trained responders shall be posted in a conspicuous, centralized location and trained personnel shall be readily identifiable.

Energy Transfer Contractor Safety Manual

D. WORKPLACE ENVIRONMENT

In general, Contractor and/or subcontractor management shall not require or allow personnel to work in conditions considered unsanitary, hazardous, or dangerous to life, health, or safety.

D.1 CHAINS, SLINGS, AND CABLES

All lifting chains, slings, and cables and associated attachments (e.g. hooks, d-rings, shackles, etc.) shall be inspected, utilized, and removed from service as required by applicable OSHA requirements (i.e. General Industry 1910.184, Construction 1926.251) in addition to the following:

1.1 Chains, slings, cables and all lifting attachments (e.g. hooks, d-rings, shackles, etc.) that have been shock loaded and/or utilized for purposes other than vertical lifts (e.g. pulling, tugging, bundling, etc.) shall be marked and prohibited from use as a vertical lifting device.

1.2 The possession and/or use of 'home-made' and/or 'shop-made' lifting devices is strictly prohibited, unless those devices have been tested and certified by an accredited entity and the applicable certifications are kept with the specified lifting devices.

D.2 CRANES, RIGGING AND CRIBBING

All Contractors and their Subcontractors utilizing cranes, rigging and cribbing during execution of their work shall be solely responsible for the proper setup, inspection, operation, maintenance, and disassembly of said equipment. Contractor and/or Subcontractor management shall not allow untrained or unauthorized personnel to perform any activities involving the assembly, use, and disassembly of cranes, rigging and/or cribbing.

D.3 CONFINED AND/OR ENCLOSED SPACES

Each Company location containing confined spaces will have an active list of those locations as well as having each easily accessible location appropriately signed/labeled. Contractor / Subcontractor personnel are expressly forbidden from entering identified areas unless local Operations personnel have made the space safe for entry and provided evidence of this action through the issuance of an applicable Company, Confined Space Entry permit.

Each Contractor and their respective subcontractors shall identify and document all confined spaces (permit required or otherwise) located in designated construction areas as defined by applicable OSHA standards [i.e. 1910.146 General Industry or 1926.21(b)(6)(ii) and/or 1926.353(b) Construction]. Contractors and subcontractors shall restrict access to all designated confined spaces by unauthorized and/or untrained personnel.

Energy Transfer Contractor Safety Manual

If Contractors and/or subcontractors require entry into confined spaces that they have created or are otherwise in exclusive care, custody, and control of, than the appropriate entity will be responsible for making the space safe for entry, completing the appropriate Contractor/Subcontractor confined space entry permit and providing the appropriate manpower with the necessary training and materials to execute the entry in a safe and compliant manner.

It will be the responsibility of each Contractor and/or subcontractor to provide for rescue services when required. Contractors and subcontractors are expressly forbidden from listing, referencing or otherwise enlisting local emergency response entities to serve as rescue service providers unless the local emergency response entity has agreed, in writing, to provide confined space rescue services. If a written agreement is obtained from said emergency services, it must be presented to the appropriate Company Operations/Construction personnel for review and approval prior to making entry into a confined space that requires rescue services.

D.4 ELECTRICAL SAFETY

D.4.1 General Electrical Safety

Affected Contractors / Subcontractors shall be responsible for implementing all electrical safety requirements in accordance with appropriate OSHA (1910 Subpart S, General Industry or 1926 Subpart K, Construction) and National Fire Prevention Association (NFPA 70E) requirements.

D.4.2 Overhead Utility Lines

Each Contractor and/or Subcontractor shall advise their personnel of the location of all identified power lines, both above and below ground. Additionally, each affected person must be informed of the dangers in coming into contact with or in close enough proximity to the line to facilitate arcing and the protective measures to avoid the specific hazards. Each individual working around or traversing under power lines shall adhere to the distancing requirements stipulated in 1926.1408 through 1411 as appropriate.

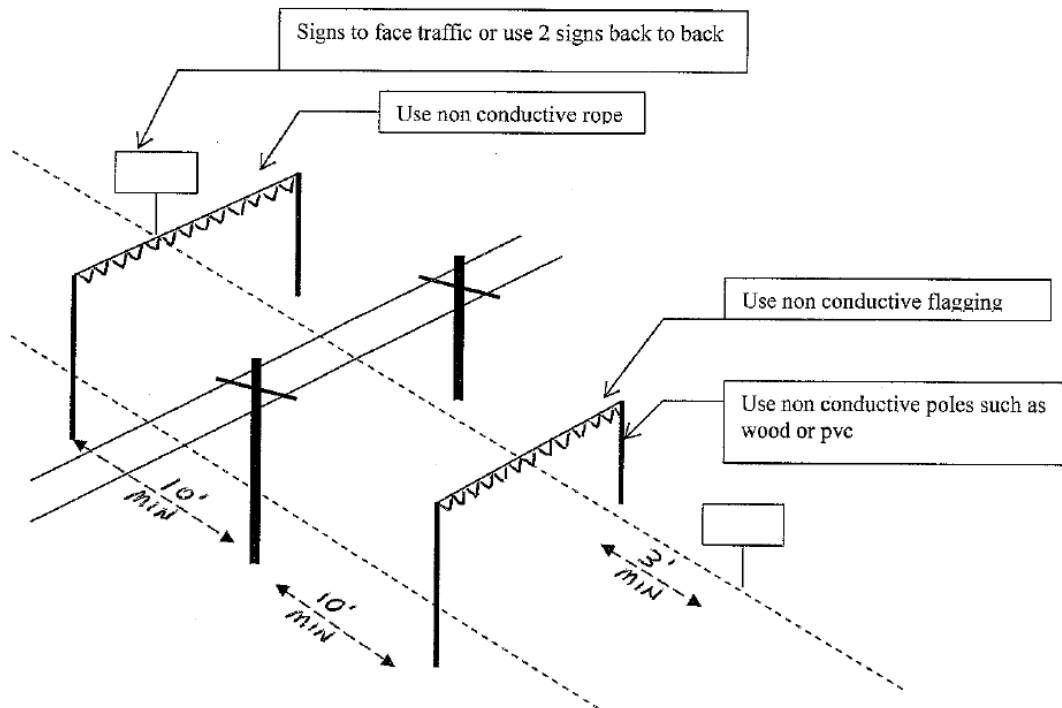
The following mandatory measures shall be taken to mark overhead power lines:

- Signage – Both “Beware of Overhead Lines” and signs marking the clearance distance from the ground to the nearest transmission lines shall be posted at eye level, on both sides of the approach. Signs shall be at least 2’x2’ with ≥ 2 ” inch lettering.
- Physical barriers - A non-conductive barrier (e.g. goal posts with rope and ribbons / flagging) shall be set on both sides of the identified line. The top of the barrier shall mark the highest safe encroachment limit. Placement of barriers directly under a power line is not allowed.
- Dedicated Spotter – shall be required anytime an object passes under a line within the non-encroachment zone.

Energy Transfer Contractor Safety Manual

When approaches to power lines make it possible, the following distances shall be observed when placing the required approach controls.

- Signage – thirteen feet from the designated power line
- Physical barriers – ten foot from the designated power line



It shall be the responsibility of each Contractor/Subcontractor to contact the owner/operator (utility company) of the identified power line to ascertain the maximum voltage of the designated line and to determine whether the line has uninterrupted service (i.e. will not de-energize when grounded). The response from the owner/operator must include information concerning any other special precautions that must be observed in order to protect the health and safety of affected personnel.

Energy Transfer Contractor Safety Manual

D.5 EXCAVATIONS / TRENCHING / SHORING

Prior to the disturbance of topsoil or any other ground coverings (i.e. concrete, asphalt, grass, tree removal, etc.) the appropriate state One Call system shall be notified and all underground encumbrances marked by the appropriate asset owner (e.g. electrical company, phone company, municipal entities, etc.). Work that includes the disturbance of any type of ground covering shall not commence prior to accomplishing this requirement.

All excavation, trenching and shoring activities, regardless of classification (i.e. General Industry, Construction) shall adhere to the requirements set forth in 29 CFR 1926 Subpart P. Additionally, each Contractor shall provide an excavation permit detailing ground conditions, integrity control methods and compliance parameters. Each permit shall be completed by a designated Contractor/Subcontractor Excavation Competent Person and posted at or in close proximity to the affected excavation areas.

All activities covered by this section shall be subject to the implementation of 'Soft-Dig' methods when excavating within two feet of existing facilities. Soft dig methods are utilized to minimize the likelihood of damaging existing facilities and may include, but are not limited to, hand digging, probing and hydro-vacuum operations.

Excavation, trenching, and shoring activities that do not meet the stipulated requirements of 1926 Subpart P and/or that will be ≥ 20 feet in depth shall be designed and approved by a Professional Engineer (PE) with the request knowledge and experience to safely design such systems. All documentation shall bear the seal of the applicable PE and be maintained at the excavation location or in close proximity to the affected area.

D.6 FALL PROTECTION

In all instances where personnel are exposed or have the potential to be exposed to a fall hazard ≥ 6 foot or when exposed to existing or potential hazards below the designated work area, without regards to height, (e.g. rotating equipment, open vats) the applicable section of 29 CFR 1926 Subpart M shall be implemented and strictly enforced.

NOTE: This requirement applies to all applicable floor, roof, and wall openings that present a fall hazard of greater than 6 feet, regardless of location.

All components of any designated Fall Arrest Systems (harness, connectors, lanyard, yo-yos, anchor points, lifelines, guardrails, hole covers, safety nets, etc.) shall be inspected prior to use and as needed during use to insure the integrity of the system. All defective components of personnel fall arrest systems must be immediately removed from service and tagged and/or decommissioned in a way that prevents use. All defective components of any other fall arrest system (guardrails, hole covers) must be repaired or replaced prior to personnel being exposed to a fall hazard in the same area.

Energy Transfer Contractor Safety Manual

All fall arrest systems utilized to protect personnel from an identified fall hazard must take into account the height from which the work will be conducted and shall choose the proper fall arrest device (e.g. lanyard) that will not allow the individual to 'pendulum', make contact with the ground or lower level if activated.

Any person operating or actively present on a personnel lift platform (e.g. man lift, scissor lift, man-basket, etc.) shall utilize fall protection in the form of a full body harness regardless of the height at which the equipment is being operated.

When personal fall arrest systems are used to protect individuals from free falling, the Contractor must take into account the methods and processes to effect rescue of a fallen individual within fifteen minutes of activating the fall arrest system. Further, each Contractor/Subcontractor shall have all the necessary equipment and/or personnel immediately available to execute the stipulated rescue procedure.

Each Contractor/Subcontractor that is required to use fall protection as set forth in the applicable OSHA standards, shall assign a competent person to oversee the implementation and maintenance of the program.

D.7 FIRE WATCH

A Fire Watch shall be required when performing welding/cutting operations or while performing activities that can potentially generate enough heat (conductive or radiant) to cause a fire in the presence of combustible and/or flammable materials. Personnel fulfilling the role of Fire Watch shall be trained (see C.11 Safety Training) in the effective removal of flammable and combustible materials, incipient firefighting techniques, the use of fire extinguishing agents, and procedures for alerting other personnel in the event of a major fire.

A Fire Watch must remain in and monitor his/her area of responsibility for a minimum of thirty minutes after hot work and/or heat generating activities have ceased to detect and extinguish possible smoldering fires.

D.8 PROTECTION FROM FALLING OBJECTS

In all cases where personnel are exposed to the hazard of falling objects each Contractor/Subcontractor shall prevent an impact event by erecting toe-boards, screens and or guardrail systems to prevent materials from falling from a higher level; OR,

Erect a canopy structure and keep potential fall objects far enough from the edge of the higher level so that those objects would not go over the edge if they were accidentally displaced; OR,

Energy Transfer Contractor Safety Manual

Barricade the area to which objects could fall, prohibit employees from entering the barricaded area, and keep objects that may fall far enough away from the edge of a higher level so that those objects would not go over the edge if they were accidentally displaced.

D.9 HAZARDOUS ENERGY ISOLATION (LOCK OUT / TAG OUT OR LOTO)

Hazardous Energy Isolation procedures shall be implemented anytime the threat of an uncontrolled release of hazardous energy, either actual or potential, can occur.

Each Contractor/Subcontractor is required to participate in Company LOTO events (i.e. Group LOTO events) in all cases where the release of hazardous energy could affect the health and safety of their personnel.

Each individual tasked with applying and removing lock-out / tag-out devices must receive the appropriate level of training to achieve compliance with the requirements of this manual and the applicable OSHA and National Fire Protection Association (NFPA) standards.

All Contractors and Subcontractors shall be solely responsible for the proper application of applicable energy isolation systems when in exclusive care, custody, and control of a system or piece of equipment that requires isolation. Each Contractor/Subcontractor shall develop and implement a hazardous energy isolation plan that conforms to the applicable requirements of 29 CFR 1926.

D.10 HOUSEKEEPING

During the course of the designated work all debris, tools, building materials and other obstructions shall not be allowed to accumulate in work areas, passageways, doorways, stairs, or in and around buildings and/or other structures. The Contractor and/or Subcontractor must manage all tools, equipment, and materials in a way that is conducive to maintaining a clutter-free work environment.

D.10.1 Sanitation

Each Contractor/Subcontractor shall maintain their respective work areas in a manner that facilitates acceptable hygiene practices. Maintain and control refuse in appropriate containers that can be closed to prevent the migration of waste via wind or animals. Keep eating and break areas free from accumulations of wastes. All waste materials shall be disposed of in accordance with applicable local, state, and/or federal regulations.

Energy Transfer Contractor Safety Manual

D.11 LADDERS & STAIRWELLS

Contractors and Subcontractors that require the use of ladders and stairwells during the course of their work shall comply with the applicable requirements of OSHA 29 CFR 1910.25 through 27 for General Industry activities, and 29 CFR 1926 Subpart X for Construction activities.

D.12 MATERIALS HANDLING, STORAGE, USE, AND DISPOSAL

D.12.1 Handling

Inspect all material handling equipment at the beginning of each shift, prior to use, and as necessary during each shift to verify safe operability. Equipment found to be defective shall be immediately marked as defective, removed from service and the immediate work area.

All Contractors and subcontractors shall develop and maintain a Hazard Communication Program that includes training requirements for affected personnel and the development of a site-specific register of hazardous materials and/or dangerous goods in accordance with applicable OSHA requirements (i.e. 1910.1200; 1926.59). The program must include means to establish and maintain Safety Data Sheets (a.k.a. Material Safety Data Sheets) for each identified material.

D.12.2 Storage

All materials shall be stored in a manner that prevents sliding, falling, or collapsing. Aisle ways and paths must remain unobstructed to provide for the free and safe movement of materials and personnel. Hazardous materials or dangerous goods must be stored in designated areas as stipulated in the applicable Safety Data Sheet and regulatory requirements.

A register of hazardous materials, dangerous goods and their associated safety data sheets shall be maintained at the project location for the duration of each project.

D.12.3 Disposal of Waste Materials

Disposal of waste materials must comply with state, federal, and local environmental regulations and/or best management practices. Waste materials shall not be abandoned or used in a manner that constitutes disposal. All hazardous and/or liquid wastes must be stored in compatible containers; intentional mixing with other material, hazardous or otherwise, is prohibited.

Energy Transfer Contractor Safety Manual

D.13 SCAFFOLDING

Contractors and Subcontractors that require the use of scaffolds during the course of their work shall comply with the applicable requirements of OSHA 29 CFR 1910.28 for General Industry or 29 CFR 1926 Subpart L for Construction.

A designated competent person shall inspect each scaffold erected on Company property before initial access is granted to anyone, except scaffold erectors, and prior to the beginning of each work shift and/or anytime the designated structure is modified after general access has been granted to authorized personnel. Colored tags shall be utilized to identify the condition/status of a given scaffolding structure according to the following.

Red Tags – red tags shall be used on all scaffolds that are in the process of being erected or that are not safe for access by personnel other than scaffold erectors. The tag must indicate that the scaffold is not safe for general use and unauthorized access is strictly prohibited.

Yellow Tags – yellow tags shall be used on all scaffolds that are complete but present specific hazards that require the implementation of special precautions. The special conditions may include but are not limited to use of a personnel fall arrest system, demarcation of the area below the scaffold to protect personnel from falling objects, the absence, or removal of scaffolding components to facilitate the designated work. All special conditions that must be met for access shall be documented on the tag.

Green Tags – green tags shall be used only on scaffolds that are complete and present no special conditions for access.

Scaffold tags shall be applied and maintained at a common access point and in a manner that does not require personnel to access the scaffold to read and/or see the tag(s). The completion of the required inspections shall be documented by requiring the Competent Person completing the review to sign and/or initial and date the back of the appropriately colored tag after each inspection event and prior to non-scaffold erection personnel accessing the structure.

D.14 ILLUMINATION

Provide sufficient natural or artificial illumination to facilitate the tasks being performed in construction areas, aisles, stairs, ramps, runways, corridors, offices, shops, and storage areas.

Energy Transfer Contractor Safety Manual

D.15 NON-POTABLE WATER

Identify outlets for non-potable water using signs that clearly indicate that the water is unsafe for drinking, washing, or cooking purposes.

D.16 POTABLE WATER

Maintain and make easily accessible, adequate supplies of potable (drinkable) water. Control of the water source shall be such that it prohibits contamination.

Note: Energy Drinks such as Red Bull and Monster are not permitted on Company projects or property.

D.17 MEANS OF EGRESS

Provide for and maintain emergency egress points and pathways at all times. The use of locks or other fastening devices on egress doorways/pathways is strictly prohibited during normal working hours and/or while workers are present.

D.18 PERSONAL HYGIENE

D.18.1 Restrooms

At a minimum, all Contractors/Subcontractors shall provide toilets for personnel according to the following table

Number of Employees	Number of Toilets Required
20 or less	1 toilet w/seat
20 or more	1 toilet w/seat & 1 urinal per 40 workers
200 or more	1 toilet w/seat & 1 urinal per 50 workers

All bathroom facilities shall be maintained in a manner that does not allow unsanitary conditions to occur.

D.18.2 Washing Facilities

Each Contractor/Subcontractor shall provide adequate washing facilities for employees engaged in manual work activities. These facilities shall be in close proximity to the worksite and shall be so equipped as to enable employees to remove work site contaminants in a timely manner. It shall be the appropriate Contractor/Subcontractor responsibility to maintain the wash station and to keep them in a sanitary condition.

D.18.3 Eating, Drinking & Break Areas

The consumption of food or beverages is strictly prohibited in bathrooms, washing areas or in any area that may facilitate exposure to unsanitary or toxic conditions. Efforts shall be made to provide an area, away from work activities, in which to take breaks and meals.

Energy Transfer Contractor Safety Manual

D.19 PROCESS SAFETY MANAGEMENT

All Contractors and Subcontractors executing work, Construction/Maintenance or otherwise, regulated by OSHA 29 CFR 1910.119 and/or 1926.64 shall obtain a copy of the applicable Company safety guidelines for Process Safety Management from their respective Company contact or by requesting a copy from the Corporate Safety Department.

E. OCCUPATIONAL HEALTH AND ENVIRONMENTAL CONTROLS

E.1 HAZARDOUS ATMOSPHERES

While visiting or during the course of work at many of our facilities, Contractor and subcontractor personnel may be exposed to hazardous atmospheres. Following is a list of potential hazardous atmospheres workers may encounter. When the potential for exposure to any of these agents exists, each affected worker shall be properly trained in the appropriate recognition and response procedures and exposure mitigation methods.

Hydrogen Sulfide (H₂S)

Benzene

Nitrogen and other inert gases

Oxygen deficient atmospheres

This summary does not include potential exposures scenarios that are created by Contractors or Subcontractors during work activities. It shall be the sole responsibility of the Contractor and/or Subcontractor to assess and mitigate exposures to hazardous atmospheres that occur as a result of Contractor / subcontractor construction or maintenance activities.

E.2 NOISE EXPOSURE

Each Contractor and/or Subcontractor shall provide protection against the effects of elevated noise exposure in accordance with the applicable sections of OSHA 29 CFR 1910.95 General Industry or 29 CFR 1926.52 Construction when the sound levels exceed those shown in the table below for the time period stated. Alternatively, hearing protection will be required in all posted areas regardless of existing noise levels unless Operations personnel permit otherwise.

Energy Transfer Contractor Safety Manual

Permissible Noise Exposures

Maximum Duration Exposure in Hours	Exposure Level in Decibels (dB)
8	90
6	92
4	95
3	97
2	100
1.5	102
1	105
0.5	110
0.25	115

Exposure to impulse or impact noise should not exceed 140 dB peak sound pressure level.

E.3 IONIZING RADIATION

While performing activities involving the use of sources of radiation, the pertinent provisions of the Nuclear Regulatory Commission Standards for Protection Against Radiation (10 CFR Part 20) relating to protection against occupational radiation exposure, shall apply.

Any activity which involves the use of radioactive materials or X-rays, whether or not under license from the Nuclear Regulatory Commission, shall be performed by competent persons specially trained in the proper and safe operation of such equipment. In the case of materials used under Commission license, only persons actually licensed, or competent persons under direction and supervision of the licensee, shall perform such work.

E.4 GASES, VAPORS, FUMES, DUSTS, AND MISTS

Contractors and subcontractors shall not expose their employees or others working in adjacent areas to inhalation, ingestion, skin absorption, or contact with any material or substance at a concentration above those specified in the most current edition of "Threshold Limit Values of Airborne Contaminants" as published by the American Conference of Governmental Industrial Hygienist.

E.4.1 Ventilation

Whenever ventilation is used to control dust, fumes, mist, vapors, and/or gases that exist or that are produced in the course of work activities in excess of the "Threshold Limit Values of Airborne Contaminants", the installation and operation of the ventilation equipment shall meet or exceed the requirements of 29 CFR 1926.57.

Energy Transfer Contractor Safety Manual

E.5 ASBESTOS

It is the responsibility of the Company to identify areas where ACM is located or maybe present and to inform Contractors/Subcontractors of the presence and location of the ACM. All historical information pertaining to presence of ACM located at a facility shall be made available to all affected Contractors/Subcontractors. If a material is thought to contain ACM but is not properly labeled, the Contractor and/or subcontractor personnel shall contact Company personnel to verify the composition of the suspect material prior to disturbance.

Asbestos containing materials (ACM) and/or suspected ACM shall not be damaged, removed, or otherwise disturbed by unauthorized Contractors, subcontractors or their personnel. Only Contractors and associated personnel that have been contracted by the Company shall be tasked with the removal of ACM in accordance with the applicable federal, state, local and Company rules and regulations.

Applicable OSHA Standards: General Industry 1910.1001; Construction 1926.1101

E.6 LEAD

It is the responsibility of the Company to identify areas where lead may be present and to inform Contractors/Subcontractors of the presence and location of lead containing materials (e.g. paint, equipment). All historical information pertaining to the presence of lead at a facility will be made available to affected Contractors/Subcontractors. If a material is thought to contain lead but has not been properly identified, Contractor/Subcontractor personnel shall contact the appropriate Company personnel to verify the absence or presence of the material prior to disturbance.

Lead containing materials and/or suspected lead containing materials shall not be damaged, removed, or otherwise disturbed by unauthorized Contractors, Subcontractors or their personnel. Only Contractors and associated personnel that have been contracted by the Company shall be tasked with the removal of lead containing materials in accordance with the applicable federal, state, local and Company rules and regulations.

Applicable OSHA Standards: General Industry 1910.1025; Construction 1926.62

E.7 RESPIRATORY PROTECTION

Each Contractor/Subcontractor shall evaluate respiratory hazards associated with their individual scopes-of-work and relevant workplace and user factors. This evaluation shall include a reasonable estimate of employee exposures to respiratory hazard(s) and an identification of the contaminant's chemical state and physical form. Where the employer cannot identify or reasonably estimate the employee exposure, the employer shall consider the atmosphere immediately dangerous to life and health (IDLH).

Energy Transfer Contractor Safety Manual

Each Contractor/Subcontractor that identifies the need for respiratory use shall establish and maintain a respiratory protection program that includes the requirements listed in 1910.1349(c) and is inclusive of each employee required to use a respirator. Additionally, the Contractor will provide for a medical evaluation in accordance with the requirements of 1910.134(e) before fit testing or requiring personnel to use a respirator in the workplace. All personnel required to use a negative or positive pressure tight-fitting face-piece must be fit-tested in accordance with the requirements of 1910.134(f). Training shall be provided to each affected person in accordance with the requirements of 1910.134(k) including procedures for proper use in accordance with 1910.134(g) and proper maintenance in accordance with 1910.134(h).

Each Contractor/Subcontractor must select an appropriate NIOSH-certified respirator that mitigates the employee's exposure to hazardous substance, when measured outside the respirator, at or below the maximum use concentration. To help ensure that respirators are acceptable to, and correctly fit the users, the Contractor/Subcontractor shall provide a sufficient number of respirator models and sizes to choose from. Respirators that do not meet the protection limit factors listed in 1910.134(d)(3)(i)(A) 'Assigned Protection Factors' shall not be used in areas where exposures to atmospheric conditions facilitate or may facilitate exceedance of the stated factors.

Contractors/Subcontractors that use respirators during the course of their work shall develop and implement an evaluation program in accordance with the requirements of 1910.134(l)

E.8 WORK PERMITS

When required by Company safety procedures, all Contractors and Subcontractors shall obtain and adhere to applicable work permit requirements. Work permits are good for one work shift and are immediately rescinded, without notice, when work site conditions change or an emergency event occurs. Generally, work permits are issued for two reasons, General and Hot Work.

E.8.1 General Work Permits are commonly issued to serve as a written authorization to perform work in designated areas that do not involve Hot Work. Each permit will give a general description of the work to be performed, where and when the work is to take place, special precautions, required personal protective equipment, and emergency information.

E.8.2 Hot Work Permits will be issued by local Operations personnel prior to commencing any hot work activities. Hot work is generally defined as any work that involves the use of open flames or other sources of ignition with the potential to generate a spark, heat or static electricity that could cause a fire or explosion. Contractors and subcontractors performing hot work are responsible for the safe execution of

Energy Transfer Contractor Safety Manual

the designated tasks. If an unsafe condition or potentially unsafe condition arises, work must be stopped and the condition reported to a Company representative.

F. MONITORING AND EVALUATION

F.1 INSPECTION, TESTING AND MONITORING

Project Safety Personnel will confirm processes are implemented to protect the welfare of employees and provide for the monitoring, maintenance and inspection of site construction activities and equipment.

F.2 HEALTH MONITORING SYSTEMS

Contractor and Subcontractors will promote a healthy work environment and see that personnel are fit to perform their normal duties safely.

F.3 WORKERS COMPENSATION

All contract employees, including subcontractors and self-employed personnel must be covered under suitable worker's compensation policy arrangements. The primary contractor will verify evidence of worker's compensation policies for subcontractors.

F.4 REGULATORY AGENCY INSPECTIONS

If a regulatory entity (RE) representative visits any Energy Transfer asset, the Contractor and/or Subcontractor representative shall immediately notify the appropriate Company representative and request that the RE representative await the Company representative's arrival prior to accessing Company facilities. If the RE representative refuses to wait and demands access, the Contractors/Subcontractors most senior representative shall escort the RE representative at all times during the absence of a Company representative. It is the Company's policy to cooperate with authorized regulatory agency inspectors. At no time shall Contractor/Subcontractor management or their personnel become combative, uncooperative, impolite or act in a manner that is contrary to acceptable professional behavior.

In almost all cases, it is a requirement that the RE representative be requested to watch the visitors portion of the Company orientation DVD (if available) and be informed of the site-specific elements that may impact him/her during their visit. Documentation of the compliance with this requirement shall be in the form of a completed Personal Acknowledgement Form and Orientation checklist. The Contractor/Subcontractor will provide personal protective equipment for the RE representative, at no cost to the RE representative, if required.

Energy Transfer Contractor Safety Manual

If violations of applicable standards/regulations are observed by the RE representative, the Contractor/Subcontractor shall take immediate action to correct them. If the RE representative takes samples (e.g. soil) or performs monitoring (e.g. noise) the Contractor/Subcontractor shall verify the sample collection by requesting a split sample or by performing parallel monitoring. Additionally, if the RE representative takes photos every effort should be made to take a similar photo at the same time, from the same angle, under the same lighting and environmental conditions.

F.4.1 Post Inspection Requirements

If a Company representative was not in attendance during the regulatory inspection:

- The Contractor/Contractor shall provide, in writing to the appropriate Company representative, all pertinent review results as soon as practical after the closing meeting, but at no greater interval than 24 hours after occurrence.
- If a citation was issued during or after the inspection event, the Contractor/Subcontractor shall notify the Company representative immediately.

Regardless of whether or not a Company representative attended the inspection event:

- The Contractor/Subcontractor representative shall document in writing, and confirm with the Company representative all potential and actual violations noted during the inspection event. Listed items should include both written and oral observations made by the RE representative.
- The Contractor/Subcontractor shall provide a list to the applicable Company representative detailing;
 - Mitigation methods that will / have been taken to correct any real or perceived findings
 - Assignment of mitigation tasks to applicable and responsible parties
 - Time line for completion of stated action items and anticipated compliance deadline.

F.5 INCIDENT REPORTING AND INVESTIGATION

All incidents must be documented and reported to the appropriated Company Representative as soon as practical after the event has occurred, but at no greater interval than twenty-four hours after occurrence. All incidents that result in a work place injury and all serious Near Miss incidents shall be investigated. Reports shall be in English and contain, at minimum, the information found in the example Company Work Related Injury or Illness Form in Appendix I of this document. Classification of work place injuries shall comply with the requirements of the Occupational Safety & Health Administration's (OSHA) 1904 standard titled Recording and Reporting Occupational Injuries and Illness.

F.6 HEALTH AND SAFETY INFORMATION AND REPORTS

The principal Company representative on each project shall establish and maintain a system for the analysis, dissemination, storage, archiving, and retrieval of information relevant to health and safety on the project.

Energy Transfer Contractor Safety Manual

Company retention and maintenance of health and safety documents shall be in accordance with the Company's document control and recordkeeping procedures. Health and safety records will be written in English, legible, identifiable, traceable, and readily retrievable. Contractors/Subcontractors health and safety performance will be monitored by tracking applicable leading and lagging indicators.

F.7 GENERAL COMPANY CONTACT INFORMATION

F.7.1 CORPORATE CONTACTS

Safety	361-578-2757 or 713-989-7149
Legal	713-989-7300
Contracts	713-989-7300
Insurance	713-989-7300

F.7.2 PIPELINE EMERGENCIES

ETC Liquids	1-888-844-8134
Fayetteville Express Pipeline	1-888-844-8030
Florida Gas	1-800-238-5066
Houston Pipeline	1-800-392-1965
LoneStar NGL	1-877-839-7473
Panhandle Eastern, Sea Robin, Trunkline	1-800-225-3913
San Antonio Gas Control, SEPTS, ET Fuel, Oasis	1-800-375-5702
Tiger	1-888-844-3735
Transwestern	1-866-999-8975
West Virginia	1-800-375-5702

Appendix I

EXAMPLE

Work Related Injury or Illness Form

EXAMPLE: Work Related Injury or Illness Form

Report Date:			Report Preparer:		
Employee Information					
First Name	MI	Last Name	Employee Number	Work Phone	Home Phone
Home Mailing Address			City	State	Zip
Email Address		Male <input type="checkbox"/> Female <input type="checkbox"/>			

Work Group Information			
Home Work Location		Job Title	Department
Supervisor	Supervisor's Phone	Hours Worked Per Day	Days Worked Per Week

Injury Or Illness Information								
Date of Injury	Time of Injury AM <input type="checkbox"/> PM <input type="checkbox"/>		Time Work Day Began AM <input type="checkbox"/> PM <input type="checkbox"/>		Date Notified of Injury.		Injury Occurred While Performing Normal Duties? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Location Where Injury Occurred			Address		City	State	Zip	Location On Client Premise? Yes <input type="checkbox"/> No <input type="checkbox"/>
Was Employee In Route To/From Home? Yes <input type="checkbox"/> No <input type="checkbox"/>			Was Employee Drug/Alcohol Tested After Injury? Yes <input type="checkbox"/> No <input type="checkbox"/>			Did Work Stop Immediately After Injury? Yes <input type="checkbox"/> No <input type="checkbox"/>		
Were Safeguards/PPE Being Used? List If Yes Yes <input type="checkbox"/> No <input type="checkbox"/>					Any Modifications To Safeguards/PPE? List If Yes Yes <input type="checkbox"/> No <input type="checkbox"/>			
Activity Being Performed Was Employee Doing When Injured?								
What Object/Substance Injured Employee?								
What Was The Cause of Injury?								
Which Body Part(s) Are Affected?			Side Of Body Left <input type="checkbox"/> Right <input type="checkbox"/> NA <input type="checkbox"/>		What Type Of Injury/Illness Was Sustained? (Sprain, Laceration)			
Incident Narrative: Provide a Detailed Description Of Events, Describe Nature Of Injuries, And Post-Accident Actions.								

EXAMPLE: Work Related Injury or Illness Form

Witness Information

Were There Any Witnesses? Yes <input type="checkbox"/> No <input type="checkbox"/>		
Witness Name	Witness Phone Number	Witness's Employer
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Treatment Information

First Aid Administered? Yes <input type="checkbox"/> No <input type="checkbox"/>	If Yes, At Work Site <input type="checkbox"/> Medical Facility <input type="checkbox"/>	Type of Treatment Performed?	
Was Employee Treated By A Medical Practitioner? Yes <input type="checkbox"/> No <input type="checkbox"/>	If Yes, Was Employee Transported By Ambulance? Yes <input type="checkbox"/> No <input type="checkbox"/>	Was Employee Hospitalized Overnight? Yes <input type="checkbox"/> No <input type="checkbox"/>	
Where Any Prescriptions Written? Yes <input type="checkbox"/> No <input type="checkbox"/>	Name of Medical Practitioner/Facility	Phone Number	
Address		City	State Zip

Return To Work Information

Did Employee Return To Work The Next Scheduled Work Day? Yes <input type="checkbox"/> No <input type="checkbox"/>	If No, Date Employee Will/Did Return To Work?	Will/Did Employee Return to Work At: Regular Duty <input type="checkbox"/> Light/Modified Duty <input type="checkbox"/>
Did Employee Obtain A <u>Physician's Work Status Report</u> From The Treatment Provider? Yes <input type="checkbox"/> No <input type="checkbox"/>	Note: A <u>Physician's Work Status Report</u> is required for all personnel who have received <i>any</i> type of treatment by a medical professional for a work related injury. The <u>Physician's Work Status Report</u> must be submitted to the employee's supervisor prior to resuming any job duties.	